



JOHN A. OLSZEWSKI, JR.
County Executive

JAMES R. BENJAMIN, JR., *County Attorney*
Office of Law

December 30, 2021

VIA E-MAIL

Daniel T. Gallo, Esquire
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029
gallo.dan@epa.gov

Re: Notice of Potential Violation and Opportunity to Confer; Regarding Alleged Violations of RCRA Subtitle C, 42 U.S.C. §§ 6901, *et seq.* Baltimore County Police Department – VSQG MDR000021667

Dear Mr. Gallo:

I am writing on behalf of the Baltimore County Police Department (“BCoPD”) in response to the Notice of Potential Violation and Opportunity to Confer (“Notice”), which was electronically signed on November 30, 2021, and to the December 8, 2021 discussion about the Notice between yourself, Andrew Van Woert from EPA Region III, and counsel for Baltimore County. Baltimore County very much appreciates EPA’s extension until December 31, 2021 to provide this response.

Enclosed with this correspondence are additional documents that may be responsive to EPA’s December 14, 2020 Request for Information. Because the enclosed documents include proprietary confidential business information, in accordance with 40 C.F.R. Part 2, Subpart B, EPA should treat this response and its enclosures as business confidential. These additional documents include a lesson plan for training officers on “Lead Poisoning” and a job description for a Training Sergeant, both of which describe and discuss hazards associated with lead shot at a firing range.

Through this correspondence, we accept the offer extended by EPA to confer and discuss the additional information provided for EPA’s review as well as engage in negotiations in furtherance of an administrative settlement and consent order, without litigation, to resolve all potential violations identified in the Notice. We look forward to working with the EPA to resolve this matter.

Sincerely,

James R. Benjamin, Jr.

James R. Benjamin, Jr.
County Attorney

Daniel T. Gallo, Esquire
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region III

cc: Andrew Van Woert (*via e-mail*)
(vanwoert.andrew@epa.gov)

Chief Melissa Hyatt, BCoPD (*via e-mail*)
Glenn T. Marrow, Esquire, Deputy County Attorney (*via e-mail*)